

**Your name and mailing address. You may include other contact information such as a fax number, telephone number, or email address.**

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**The specific section or sections of Title 14 of the Code of Federal Regulations (CFR) from which you seek an exemption.**

We seek relief from §65.65, aircraft dispatcher certification courses: training facilities, which requires Aircraft Dispatcher Certification Courses to be facilitated in-person: “[a]n applicant for approval of authority to operate an aircraft dispatcher course of study must have facilities, equipment, and materials adequate to provide each student the theoretical and practical aspects of aircraft dispatching. Each room, training booth, or other space used for instructional purposes must be temperature controlled, lighted, and ventilated to conform to local building, sanitation, and health codes. In addition, the training facility must be so located that the students in that facility are not distracted by the instruction conducted in other rooms”.

**The extent of relief you seek and the reason you seek the relief.**

The majority of Aircraft Dispatcher Certification Courses facilitate the theoretical aspects of aircraft dispatching training remotely as computer-based training (CBT). We seek relief from the aforementioned part to be able to also facilitate the practical aspects of aircraft dispatching training remotely for a trial period of indefinite duration. The latter will still be interactive and facilitated in real-time by a qualified instructor.

**How your request would benefit the public as a whole.**

Per the Centers for Disease Control and Prevention, relief from the aforementioned part would make the course safer as only about half of the American population has been fully inoculated with a COVID-19 vaccine (see “Considerations for Institutions of Higher Education (IHEs).pdf”).

In the present day, airlines are not only acquiring new aircraft but new airlines are entering the market to capture new segments. The majority of airlines in the United States have posted at least one Aircraft Dispatcher, Assistant Dispatcher, or Flight Follower requisition this year. The full remote access to an Aircraft Dispatcher Certification Course would make the education more accessible to the public as well as certify exceptional candidates who may have, otherwise, been unable to block out 3-11 weeks of their schedule for the purposes of the training.

Lastly, the world of airline dispatching, and aviation in general, is digital and online learning has been demonstrated to be more effective (see Nguyen, 2015). This exemption could make the

training all the more relevant and empower candidates to promote safer and more efficient operations.

**Reasons why the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to the existing rule**

The exemption would not adversely affect safety as the content will remain the same and the delivery of practical aspects of aircraft dispatching training would still be interactive and facilitated in real-time. Academic integrity would be preserved by utilizing a remote live proctor for assessments (such as Examity, see “Live Proctoring - Examity.pdf”). The trainees would also still be held to the same standards as students who received in-person training by their Designated Aircraft Dispatcher Examiners.

**A summary we can publish in the Federal Register stating:**

- **The rule from which you seek the exemption**  
§65.65, Aircraft dispatcher certification courses: Training facilities

- **A brief description of the exemption you seek**  
We seek relief from the requirement for Aircraft Dispatcher Certification Courses to be facilitated in-person.

**If you want to exercise the privileges of your exemption outside the United States, you must state the reason.**

We request to exercise the aforementioned exemption outside the United States. The majority of American Aircraft Dispatcher Certification Courses train hundreds of international students a year – not only benefiting our economy but also spreading airmen trained to our standards all over the world. We, therefore, request to also be able to provide these citizens and non-citizens residing in other countries with remote access to both certified theoretical and practical aspects of aircraft dispatching training.